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BY ECF

Honorable Robert M. Levy
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Michael Davis v. City of New York, et al., 15 CV 00090 (SJ)(RML)

Dear Magistrate Judge Levy:

I am an attorney in the office of Zachary W. Carter, Corporation Counsel of the City of New York, counsel for defendants in the above-referenced action. The Defendants respectfully request that their time to respond to the Complaint be extended sixty days from January 29, 2015 to March 30, 2015.

The Complaint claims that plaintiff's federal civil rights were violated when inspectors with the New York City Taxi & Limousine ("TLC") took enforcement action against him for violating New York City Administrative Code Section 19-506(b)(1). In order to respond to the Complaint, the Defendants must gather and review agency documents and confer with the relevant members of the TLC. Thus, in keeping with this Office's obligations under Rule 11 of the Federal Rules of Civil Procedure, we need additional time to investigate the allegations set forth in the Complaint.

This is the Defendants' first request for an extension of time to respond to the Complaint. I have reached out to counsel for plaintiff and obtained his consent to this extension. Accordingly, we respectfully request that the Defendants time to answer the Complaint be extended to March 30, 2015.

Thank you for your consideration of this request.

Respectfully submitted,



Nicholas R. Ciappetta (NC 1014)

cc: Jon L. Norinsberg, Esq. (by e-mail)